

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA : 17 Cr. 548 (PAC)
: :
-v- : NOTICE OF MOTION
: :
JOSHUA ADAM SCHULTE : :
: :
Defendant. : :
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PLEASE TAKE NOTICE, that defendant **Joshua Adam Schulte**, by and through his counsel, will move this Court, before the Honorable Paul A. Crotty, United States District Judge for the Southern District of New York, for an Order:

1. Suppressing, pursuant to Fed. R. Crim. P. 12(b)(3)(C), all evidence recovered from:
 - a. any documents seized from Mr. Schulte's former cell at the Metropolitan Correctional Center on October 2, 2018, and
 - b. a CD containing the contents of three encrypted email accounts, resulting from a warrant issued on October 6, 2018, and
 - c. laptops resulting from a warrant issued on October 16, 2018, and
 - d. the Buffer, Facebook, Twitter, Automattic, and Google accounts, resulting from warrants issued on October 26, 2018, or
2. In the alternative, directing an evidentiary hearing to determine the extent to which the prosecution team (including the case agent) benefitted from information obtained in violation of Mr. Schulte's attorney-client

privilege, or

3. In the alternative, suppressing all pages protected by privilege that the wall team failed to redact, and
4. Granting such other and further relief as the Court may deem just and proper.

DATED: New York, New York
June 18, 2019

Respectfully submitted,

Federal Defenders of New York

/s/ Sabrina P. Shroff

By: _____
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